

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

Ameriway Corporation

Plaintiff,

v.

May Yan Chen,

Ability Customs, Inc.,

Defendants.

19-cv-09407 (VSB) (DCF)

**PLAINTIFF'S MOTION TO DISQUALIFY DEFENDANTS' COUNSEL RICHARD
SCHRIER AND WILLIAM SHAYNE, AND FOR DEFAULT JUDGMENT, DISMISSAL,
AND ATTORNEYS' FEES FOR FRAUD ON THE COURT**

Plaintiffs, by and through undersigned counsel, hereby move to disqualify Defendants' counsel Richard Schrier and William Shayne in this matter for misconduct under the Model Code of Prof'l Responsibility (Canons 1 and 9) and N.Y. Rules Prof'l Conduct Rule 8.4(c), as well as under the "lawyer-witness rule," N.Y. Rules Prof'l Conduct. 3.7(a). Plaintiffs also move for default judgment, dismissal, and attorneys' fees for fraud on the Court by Chen and her counsel pursuant to the Court's inherent powers. The grounds for this Motion are set forth in the accompanying brief, filed herewith.

Dated: June 24, 2022

Respectfully submitted,

By: _____


Peter S. Wolfgram
Xiyan Zhang
STRATUM LAW LLC
*Attorneys for Plaintiff,
Ameriway Corporation*